

MEMO ENDORSED

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October 16, 2023

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/17/2023

Hon. Barbara C. Moses, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007
VIA ECF

Re: Leitch et al. v. Amazon Services Com LLC
SDNY Docket No.: 22-cv-06121- BCM

Dear Judge Moses,

I represent Plaintiffs in this matter. For the reasons that follow, this is a joint request for an extension of time for the parties to file a letter respecting continued discovery disputes (the “Letter”) from today to Wednesday, October 18, 2023. All previous requests applications have been granted. There is no prejudice to any party.

The reason for the request is that defense counsel advise that they need a bit more time to respond to Plaintiffs’ position with respect to the status of discovery. After a meet and confer session on Friday, October 13, 2023 each side understood what its position would be. However, defense counsel waited for me to submit Plaintiffs’ section so that they would be able to respond. Unfortunately, I was able to submit my part today at 4:00PM owing to an emergency application in another matter which took up my weekend and most of today. Defense counsel valiantly attempted to respond by today’s deadline but ran out of time (one of the attorneys of record is traveling on business and could not be reached). Consequently, defense counsel need two more days to address themselves to Plaintiff’s position statement.

Wherefore, the parties respectfully request Your Honor’s final indulgence to permit them to file the Letter by Wednesday, October 18, 2023.

Respectfully submitted,

/s/ Robert Wisniewski
Robert Wisniewski

cc: All counsel of record via ECF

Application GRANTED. SO ORDERED.



Barbara Moses
United States Magistrate Judge
October 17, 2023